

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FLORIDA CABLE
TELECOMMUNICATIONS ASSOCIATION,
INC.,

Complainants,

v.

GULF POWER COMPANY,

Respondent.

E.B. Docket No. 04-381

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NOV - 4 2005

To: Office of the Secretary

Attn.: The Honorable Richard L. Sippel
Chief Administrative Law Judge

Federal Communications Commission
Office of Secretary

**MOTION FOR ADDITIONAL TIME TO COMPLY WITH
ORDER ON GULF POWER'S MOTION TO RECONSIDER**

Gulf Power Company ("Gulf Power"), pursuant to the Presiding Judge's October 12, 2005 Order, moves to establish a deadline of December 16, 2005 for Gulf Power's non-binding response to Complainant's Document Request No. 15. In support of this motion, Gulf Power says the following:

1. On September 21, 2005, the Presiding Judge issued the Second Discovery Order, instructing Gulf Power, in response to complainants' Request No. 15, to "identify 'maps, diagrams or schematics' that depict poles holding Complainants' CATV attachments, regardless of 'full capacity.' Then identify those poles that Gulf Power contends are at full capacity," using a "color scheme or some such method of depicting poles holding Complainants' CATV cable that are alleged to be at full capacity." (Second Discovery Order, p. 4). In response, on

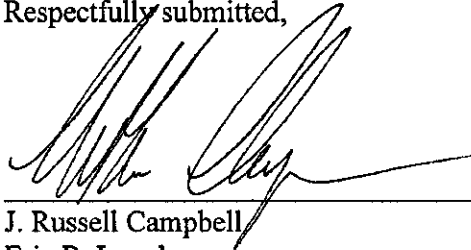
September 30, 2005, Gulf Power filed its Motion to Reconsider Limited Portions of Second Discovery Order, arguing that this portion of the Second Discovery Order called for the creation of a new document, which Gulf Power was not required to produce. (Motion to Reconsider, p. 5).

2. On October 12, 2005, the Presiding Judge issued an Order, requiring Gulf Power to proceed with a non-binding production of documents responsive to complainants' Request No. 15 in the manner prescribed by the Second Discovery Order. The October 12, 2005 Order also advised that the Presiding Judge would consider "any reasonable request for additional time to comply" with the ruling. (October 12, 2005 Order, p. 4).

3. Gulf Power believes that a December 16, 2005 deadline would allow sufficient time to respond to Request No. 15 in the manner prescribed by the Presiding Judge. Given the upcoming depositions scheduled for the week of November 14-18, 2005, and the Thanksgiving holiday, Gulf Power believes that December 16, 2005 is a sensible deadline that takes the schedules of all parties into account.

4. Gulf Power respectfully requests that the Presiding Judge enter an order setting December 16, 2005 as the deadline for Gulf Power's non-binding response to complainants' Request No. 15.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been served upon the following by Electronic Mail and by United States Mail on this the 4th day of November, 2005:

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